

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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LINDZY ROTHKRANZ, on behalf of herself  
and all others similarly situated,

Plaintiff,

v.

UNLIMITED CARE INC.,

Defendant.

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CASE NO. 23-6350

CLASS ACTION COMPLAINT

**PLAINTIFF'S VOLUNTARY NOTICE OF DISMISSAL WITHOUT PREJUDICE**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), Plaintiff Lindzy Rothkranz, Plaintiff, hereby gives notice that her claims in this action against Defendant are voluntarily dismissed without prejudice.

Dated: December 1, 2023

Respectfully submitted,

/s/ James Bilsborrow  
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New York, NY 10003  
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*Attorney for Plaintiff*

**CERTIFICATE OF SERVICE**

I, James Bilsborrow, hereby certify that on December 1, 2023, I electronically filed the foregoing document with the Clerk of Court using CM/ECF, which provided notice of the filing to all counsel of record through the Court's electronic filing system.

/s/ James Bilsborrow